

[Counsel listed on signature page]

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

IN RE UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

Case No.: 3:23-MD-03084-CRB

**PARTIES' JOINT STATUS REPORT  
AND STATEMENT PURSUANT TO  
ECF 3172 REGARDING CONFERRAL  
EFFORTS**

This Document Relates to:

ALL BELLWETHER ACTIONS

Judge: Hon. Lisa J. Cisneros  
Courtroom: G – 15<sup>th</sup> Floor

Dear Judge Cisneros:

As ordered by the Court (Dkt. No. 3172), the parties submit this joint status report regarding which disputes have been resolved and which remain active.

The parties met and conferred extensively on June 4 and June 6 in an attempt to narrow the issues in dispute. They will, as ordered, continue to meet and confer before Monday's in-person conferral, and will submit a further status update if the issues in dispute are further narrowed.

**Disputes Substantively Resolved:** There is still ongoing conferral regarding the timing of production or response.

- **Interrogatory No. 1:** Plaintiffs assume that the Court's narrowing of the scope of production related to alcohol-related advertising applies equally to the related interrogatory (interrogatory no. 1 for Jaylynn Dean and B.L.) and accordingly there is no remaining substantive dispute (other than timing of Defendants' response, which is the subject of ongoing conferrals).
- **Interrogatory 12:** This was resolved by the Court's order.
- **Requests for Production 16, 17, 21, 23, 24, 45, 51:** Defendants' counsel reiterated that there is no dispute, and that it will identify responsive Bates ranges, so that the only issue is related to timing of the production and response, which is the subject of ongoing conferrals.
- **Requests for Production No 27:** Defendants' counsel reiterated that there is no dispute, and that the only issue is related to timing of the production and response, which is the subject of ongoing conferrals.

- **Requests for Production No. 54:** Defendants' counsel clarified that it does not retain the offer cards, but that it will produce the underlying substantive information that comprises the offer cards.
- **Request for Production No. 57:** Plaintiffs agreed to narrow the request for alcohol-related advertising to only two Wave 1 cases (B.L. and Jaylynn Dean), rather than all four of the Wave 1 cases in which the Plaintiffs consumed alcohol before the subject ride. This concession was made on June 4 before the parties received the Court's order narrowing the temporal scope of the same discovery. Further, the parties have clarified that the request is not limited to advertising that targeted a particular town. They agree that Defendants will produce both national and regional advertising that encompassed the Plaintiff's place of residence, to the extent available following a reasonable and diligent search, so long as that advertising was otherwise within the scope of this discovery.

**Disputes that Continue to be Discussed:**

- **Timing for all Requests for Production.**
- **All other Requests for Production not Specifically Listed Above.**
- **Interrogatory No. 13:** The parties are meeting and conferring consistent with the Court's directive.
- **Interrogatories No. 4-9, 14-22:** Defendants have agreed to amend its responses, and the parties are continuing to confer about the timing of these amendments.

Dated: June 6, 2025

Respectfully Submitted,

By: /s/ Roopal P. Luhana

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**ATTESTATION**

Pursuant to Civil Local Rule 5-1(h)(3), I hereby attest that all signatories listed, and on whose behalf the filing is submitted, concur in the filing's consent and have authorized the filing.

Dated: June 6, 2025

By: /s/ Michael B. Shortnacy